

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FT. WORTH DIVISION

=====	:	
POINT BRIDGE CAPITAL, LLC,	:	
HAL LAMBERT,	:	
Plaintiffs,	:	Case No. 4:24-cv-00988-P
	:	
	:	
— <i>versus</i> —	:	Hon. Mark Pittman
	:	U.S. District Judge
	:	
CHARLES JOHNSON,	:	
Defendant.	:	
=====	:	

Motion to Appear With Local Civil Counsel

In accordance with L.Civ.R. 83.10(a), the undersigned counsel respectfully requests leave to appear without local counsel on behalf of Defendant CHARLES JOHNSON, in the above-captioned matter.

Movant seeks this relief based upon the fact that the Defendant is of limited means, and that retaining geographically local counsel will impose an unreasonable burden upon him. Furthermore, Movant is attorney of record for the Defendant in other matters, and assumed a level of trust and confidentiality necessary to proceed in this matter.

Further, in anticipation of Movant appearing in this matter, on November 06, 2024 Movant filed an application for admission to practice before the Bar of this Court. This application was granted (on November 14, 2024), and, on November 15, 2024, Movant was duly sworn in by the Hon. Vincent Briccetti, Sr. Judge, of the Southern District of New York. In addition, thereto, Movant has paid the requisite \$200 application fee to this Court.

Movant has familiarized himself with the Local Civil Rules of this Court, and the Rules of Your Honor, as they appear on the Court's website.

I duly affirm that I have read this Court ruling in *Dondi Properties Corp. v. Commerce Savings & Loan Ass'n*, 121 F.R.D. 284 (N.D. Tex. 1988) (*en banc*), and the local civil rules of this court, and that the attorney will comply with all of the standards of practice and behavior and conduct adopted in *Dondi*, and with the local civil rules, and with the Judge Specific Requirements of Your Honor..

Further, Movant would also respectfully request that the Court grant the Defendant until Friday, November 22, 2024, to file his Answer to the Amended Complaint. The Amended Complaint was filed with this Court on October 28, 2024, and, to avoid un-necessary time and expense, Counsel herein agreed to accept service on Mr. Johnson's behalf. As such, the answer to the Amended Complaint (as efiled October 28, 2024), is due on or before November 18, 2024. Movant would, further, request an extension of four days, until November 22, 2024 to file any Answer.

Movant, pursuant to L.Civ.R. 7.1(b), has conferred with counsel for the Plaintiffs, and they have graciously stated that they have no objection to the requests made herein.

/s/ Bernard V. Kleinman
Bernard V. Kleinman, Esq.
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CERTIFICATE OF SERVICE

I certify that on November 18, 2024, the foregoing *Motion for Leave to Appear without Local Counsel and to File Answer and Proposed Order* were filed electronically with the Court. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties. Parties may access this filing through the Court's system.

/s/ Bernard V. Kleinman
Bernard V. Kleinman, Esq.
Attorney for Defendant CHARLES JOHNSON

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	:	
CHARLES JOHNSON,	:	
Defendant.	:	
=====	:	

PROPOSED ORDER

ORDER:

Before the Court is Defendants' Motion (ECF No. 1). Having considered the Motion, relevant docket entries, and applicable law, the Court **GRANTS** the Motion.
SO ORDERED on this ____ day of November 2024.

Dated

Hon. Mark Pittman
U.S. District Judge